

UNITED STATES DISTRICT COURT

for the
Eastern District of Tennessee

United States of America
v.
CLARENCE L. MCDOWELL

Case No. 3:15-MJ-2128

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 8, 2015 in the county of Knox in the
Eastern District of Tennessee, the defendant(s) violated:

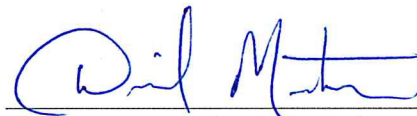
Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm

This criminal complaint is based on these facts:

Please see the Affidavit of Trooper Daniel Morton, Tennessee Highway Patrol, which is attached hereto and fully incorporation herein.

☒ Continued on the attached sheet.



Complainant's signature
Trooper Daniel Morton
Tennessee Highway Patrol
Printed name and title

Sworn to before me and signed in my presence.

Date: June 8, 2015



Judge's signature

City and state: Knoxville, Tennessee

H. Bruce Guyton, United States Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

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CLARENCE L. MCDOWELL

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Daniel Morton, being duly sworn, state as follows:

1. I am employed by the Tennessee Highway Patrol (THP) and have been so employed since January 2007. From May 2006 up to my employment by the THP, I was employed by the Lenoir City Police Department as a patrol officer.

2. I am currently assigned as an Investigator in the Criminal Investigation Division of THP and a Task Force Officer to the United States Secret Service Electronic Crimes Task Force. Both units are charged with the investigation of criminal conduct in violation of Tennessee and federal laws concerning financial, weapons and other related criminal activities. In the performance of my duties both as a uniformed law enforcement officer and a narcotics and financial crimes investigator, I have conducted and participated in numerous investigations involving narcotics and other general investigations of state and federal laws. I have been involved in the investigations of numerous other criminal activities including but not limited to firearms violations and violent offenses.

3. I completed a basic police academy through the THP from January through June 2007. I have been trained in basic criminal investigations. On June 8, 2015, I was requested by the Internal Revenue Service – Criminal Investigation to assist with the execution of multiple search and seizure warrants, specifically for the search of Palace Package Store, located at 3204 Rudy Street, Knoxville, Tennessee 37921, case number 3:15-MJ-02096.

4. The information contained within the affidavit is based upon information I have gained from our Operations Briefing and my participation in the execution of the search warrant at 3204 Rudy Street, Knoxville, Tennessee. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning the search warrant execution. I make this affidavit in support of the issuance of a criminal complaint and arrest warrant for CLARENCE L. MCDOWELL ("MCDOWELL"). Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that MCDOWELL committed the following federal violation, felon in possession of a firearm in violation of Title 18, United States Code, Sections 922(g)(1).

5. During the execution of the federal search warrants, the Palace Package Store was secured by agents. MCDOWELL provided the key to the locked desk located in the office of the store. Prior to entering, as a safety precaution, agents asked MCDOWELL if there were any weapons in the office. MCDOWELL advised of the possibility of a firearm in the desk drawer. MCDOWELL stated the gun was owned by his son who was previously employed at the store. Using the key provided by MCDOWELL, agents unlocked the desk and located a Glock Model 19, 9 millimeter, semi-automatic handgun in the top left drawer. The handgun magazine was loaded to full capacity of 15 rounds and one round in the chamber.

6. The defendant has a prior felony conviction from the Northern District of Georgia in 1982 for violation of T. 21, S.846 USC, attempt to possess and distribute cocaine. I have been advised the firearm was manufactured outside the state of Tennessee and thus, it traveled in and affected interstate commerce.

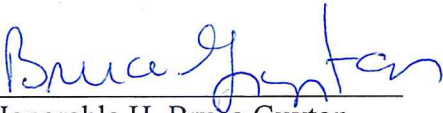
7. At approximately 2:30 p.m., the subject was taken into custody without incident.

FURTHER AFFIANT SAYETH NOT.



Daniel Morton
Trooper
Tennessee Highway Patrol

Subscribed and sworn before me
this 8th day of June, 2015.



Honorable H. Bruce Guyton
United States Magistrate Judge